

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

APPLICATION OF LOUDMILA  
BOURLAKOVA AND VERONICA  
BOURLAKOVA TO TAKE DISCOVERY FOR  
USE IN A FOREIGN PROCEEDING  
PURSUANT TO 28 U.S.C. § 1782

Case No. 24 Misc. \_\_\_\_\_

**DECLARATION OF DANIEL J.  
POHLMAN IN SUPPORT OF  
APPLICATION TO TAKE  
DISCOVERY**

I, DANIEL J. POHLMAN, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an associate at the law firm Pryor Cashman LLP, counsel to Petitioners Loudmila Bourlakova (“Mrs. Bourlakova” or “Loudmila”) and Veronica Bourlakova (“Veronica” and together with Loudmila, “Petitioners”).


2. I submit this declaration in support of Petitioners’ Application and Petition for an Order, pursuant to 28 U.S.C. § 1782 to obtain discovery from Clearing House Payments Company, L.L.C. (“CHIPS”) and to transmit true and correct copies of the following documents.

3. A copy of Petitioners’ proposed subpoena on CHIPS and its accompanying “Attachment A” is attached **Exhibit 1** hereto.

4. A copy of a proposed Order granting Petitioners’ request to serve their proposed subpoena on CHIPS is attached as **Exhibit 2** hereto.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, NY  
February 20, 2024

  
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Daniel J. Pohlman  
Counsel for Petitioners